

February 18, 2025

VIA ECF and EMAIL: [Chambers of Judge Gail Weilheimer@paed.uscourts.gov](mailto:Chambers_of_Judge_Gail_Weilheimer@paed.uscourts.gov)

The Honorable Gail Weilheimer
7614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: *Simona Ockley v. Radnor Township, et al.*
USDC for the Eastern District of Pennsylvania; No: 2:24-cv-04070

Dear Judge Weilheimer:

Please be advised that our office represents the Plaintiff in the above-captioned matter. After a recent meeting with all counsel, it was suggested that we should extend the current deadlines. Plaintiff and Defendants are working together to schedule the numerous depositions. Discovery is ongoing. We request additional time to complete Discovery and as a consequence move related deadlines.

This is a joint request of all counsel.

We are asking the Court for a sixty (60) day extension of all deadlines noted in the initial Scheduling Order dated November 21, 2024, and signed by Judge Sanchez. We have enclosed a Stipulation and Proposed Order for your review.

Additionally, the parties are agreeable to early Mediation and would respectfully request that a Magistrate Judge be assigned to the matter who can conduct same. Your cooperation is appreciated.

Respectfully submitted,
SCHROM, SHAFFER & BOTEL, P.C.



Gerard K. Schrom, Esquire

GKS/ecm
Enclosures

cc: Joseph P. Gonzales, Esquire (w/enclosures) (via ecf and email only: jpgonzales@mdwccg.com)
Todd Bartos, Esquire (w/enclosures) (via ecf and email only: tb@sprucelaw.com)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SIMONA OCKLEY,

Plaintiff,

v.

**TOWNSHIP OF RADNOR,
PENNSYLVANIA, et al.,**

Defendants.

**CIVIL ACTION NO:
2:24-cv-0470-GAW**

JOINT STIPULATION TO EXTEND SCHEDULING ORDER DEADLINES

It is hereby stipulated by and between the parties to extend the current deadlines in the

Scheduling Order dated November, 21, 2024, by sixty days (60) days, as set forth below:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Discovery Deadline	March 21, 2025	May 20, 2025
Plaintiff's Expert Report	April 4, 2025	June 3, 2025
Defendant's Expert Report	April 11, 2025	June 10, 2025
Dispositive Motions	April 25, 2025	June 24, 2025
Responses to Dispositive Motions	May 9, 2025	July 8, 2025
Teleconference to Discuss Settlement	May 14, 2025	July 13, 2025
Motions in Limine	May 20, 2025	July 19, 2025
Responses to Motions in Limine	June 3, 2025	August 2, 2025
Plaintiff's Pretrial Memorandum	June 3, 2025	August 2, 2025
Defendant's Pretrial Memorandum	June 3, 2025	August 2, 2025
Joint requested points for charge, joint proposed verdict slip and voir dire questions	June 3, 2025	August 2, 2025
Final Pretrial Conference	June 9, 2025	August 8, 2025
Trial Pool	June 16, 2025	August 15, 2025

Stipulated and Agreed to by:

2/18/2025

Dated

/s/ Gerard K. Schrom

Gerard K. Schrom, Esquire
Attorney for Plaintiff Simona Ockley

2/18/2025

Dated

/s/ Joseph P. Gonzales

Joseph P. Gonzales, Esquire
Attorney for Defendants Radonor Township

2/18/2025

Dated

/s/ Todd Bartos

Todd Bartos, Esquire
*Attorney for Defendants, Jeffrey Brydzinski and
Tyler Prete*

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SIMONA OCKLEY,

Plaintiff,

v.

**TOWNSHIP OF RADNOR,
PENNSYLVANIA, et al.,**

Defendants.

**CIVIL ACTION NO:
2:24-cv-0470-GAW**

PROPOSED ORDER TO EXTEND SCHEDULING ORDER DEADLINES

AND NOW this ____ day of _____, by Stipulation of all parties, it is hereby

ORDERED that the deadlines in the Scheduling Order dated November 21, 2024, has been extended by sixty (60) days, as set forth below:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Discovery Deadline	March 21, 2025	May 20, 2025
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IT IS SO ORDERED.

HONORABLE GAIL A. WEILHEIMER